

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2020-264-E
DOCKET NO. 2020-265-E**

IN THE MATTER OF:

Duke Energy Carolinas, LLC's Establishment
of Solar Choice Metering Tariffs Pursuant to
S.C. Code Ann. Section 58-40-20

Duke Energy Progress, LLC's Establishment of
Solar Choice Metering Tariffs Pursuant to S.C.
Code Ann. Section 58-40-20

**PETITION TO INTERVENE
OF VOTE SOLAR**

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Vote Solar hereby respectfully petitions to intervene in the above-captioned dockets. Vote Solar states the following grounds in support of this petition:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar¹ works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 110,000 members nationally and more than 2,300 in South Carolina, including members within Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's service territories.

¹ Vote Solar is not an industry group and does not have solar industry members.

2. In state regulatory proceedings, Vote Solar primarily focuses on rate design and public policy issues related to consumer use of and access to distributed solar generation. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other forms of distributed solar, Vote Solar has actively participated in utility commission proceedings across the country involving net metering, interconnection, rate design, and resource procurement, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, South Carolina, Utah, Vermont, and Wisconsin. In each of these cases, Vote Solar effectively advocated against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize distributed solar generation to effectively manage electricity costs.

3. The name and principal business address of Petitioner:

Vote Solar
360 22nd St., #730
Oakland, CA 94612

4. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina and requests that undersigned counsel be added to the official service list:

Thadeus B. Culley
SC Bar # 104428
Vote Solar
Sr. Regional Director and Regulatory Counsel, Southeast
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

5. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket should be directed to Vote Solar's counsel of record.

6. Vote Solar has a substantial interest in the subject matter of this proceeding. Vote Solar participated in a stakeholder process led by the Office of Regulatory Staff over the summer of 2019 to explore solutions to the then pending net metering cap. Vote Solar worked with stakeholders throughout the development of the Energy Freedom Act (Act 62) on net metering issues and has a direct interest in fulfilling the implementation of the provisions of the Energy Freedom Act. Vote Solar is an intervenor and active participant in related generic Docket No. 2019-182-E, which addresses methodologies for valuing customer-sited solar and for evaluating the benefits and costs of the existing net metering program.

7. Vote Solar has extensive national experience on matters of distributed generation valuation and methodology, rate design, cost-benefit evaluations of distributed energy resources, and net metering policy. Vote Solar expects to meaningfully contribute to the development of the record in this proceeding and to provide evidence consistent with the requirements of the Energy Freedom Act.

8. Vote Solar is a signatory to the Stipulation filed in Docket Nos. 2020-264-E and 2020-265-E regarding implementation of Solar Choice Metering tariffs and supports Commission approval of the Companies' Joint Application in these dockets.

9. No other party will adequately represent Vote Solar's unique interest.

WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted this 23rd day of November, 2020.

/s/ Thadeus B. Culley
Thadeus B. Culley
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Counsel for Vote Solar
1911 Ephesus Church Road
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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket Nos. 2020-264-E and 2020-265-E, listed below, a copy of the Petition to Intervene of Vote Solar via U.S. Mail or electronic mail on this day, November 23, 2020.

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